

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>CRIMINAL NO. 3:23-CR-149</b>
	:	
<b>DAMIEN BOLAND,</b>	:	
<b>ALFRED ATSUS,</b>	:	
<b>JOSEPH ATSUS AND</b>	:	<b>JUDGE MANNION</b>
<b>NICHOLAS DOMBEK</b>	:	
	:	
<b>Defendants.</b>	:	<b>ELECTRONICALLY FILED</b>

**DEFENDANTS' JOINT REQUEST  
PURSUANT TO FED. R. CRIM. P. 12(b)(4)(B)**

Defendants Damien Boland, Alfred Atsus, and Joseph Atsus, by and through their undersigned counsel, hereby respectfully request notice of the prosecution's intent to use (in its evidence-in-chief at trial) any evidence that may be entitled to discover under Rule 16.

Respectfully submitted,

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Date: July 12, 2024

**CERTIFICATE OF SERVICE**

I, Patrick A. Casey, hereby certify that a true and correct copy of the foregoing Joint Request Pursuant to Fed. R. Crim. P. 12(b)(4)(B) was served upon the counsel of record via the Court's ECF system on this 12<sup>th</sup> day of July 2024:

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